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January 23, 2024

VIA ELECTRONIC CASE FILING

Hon. Lorna G. Schofield
Thurgood Marshall
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Honorable Judge Schofield,

Re: Timothy Rodgers v. Mercy College, et. al.
Docket No.: 23-CV-07278

As the record reflects, we are the attorneys for the Plaintiff in the above-referenced matter. We respectfully submit this correspondence in accordance with Your Honor's Order dated January 23, 2024 directing Plaintiff to identify the social media account(s) we believe belong to Defendant Southard and state the reason(s) for such belief.

On November 4, 2023 the investigative firm hired by Plaintiff conducted a search for Defendant Southard which included a social media search. That search identified two accounts linked to the name Kristine Southard, a LinkedIn account and several FaceBook accounts, all of which our investigator determined may still be active. Our investigator was able to verify the LinkedIn account as belonging, or belonged, to Defendant Southard. Our investigator has not yet verified whether any of the FaceBook accounts belongs to Defendant Southard. If the Court grants our application for alternative service, we will seek to verify the FaceBook accounts as belonging to Defendant Southard and employ service through social media and/or any other means this Court sees fit.

We thank the Court for its time and attention in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Manuel III", is written over the word "Sincerely,". Below the signature, the name "Albert D. Manuel III" is printed in a black, serif font.

Albert D. Manuel III

ADM:dm